

Honorable Judge Marsha J. Pechman
Hearing Date July 28, 2025
Without Oral Argument

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KELLI MCCLURE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

ROCKETREACH LLC,

Defendant.

CAUSE NO. 2:25-cv-00986

**ORDER AND STIPULATED MOTION
FOR ENTRY OF BRIEFING
SCHEDULE FOR FORTHCOMING
AMENDMENT OF COMPLAINT AND
MOTION PRACTICE**

Plaintiff Kelli McClure and Defendant RocketReach LLC hereby jointly move the Court for an order setting a briefing schedule for Plaintiff's forthcoming amendment of her Complaint and corresponding subsequent motion practice.

On April 10, 2025, Plaintiff filed the summons and complaint against Defendant in the Superior Court for the State of Washington in and for the County of King ("State Court").

On May 23, 2025, Defendant filed a Notice of Removal to the U.S. District Court for the Western District of Washington.

On May 30, 2025, this Court granted the Parties' Joint Motion to Extend Time to Respond, providing a deadline of July 7, 2025, for Defendant to respond to Plaintiff's

STIPULATED MOTION AND ORDER TO SET BRIEFING
SCHEDULE – 1

CAUSE NO. 2:25-cv-00986

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Complaint. See Docket #11.

On June 27, 2025, the Court Granted the Parties' Second Stipulated Motion to Extend Time to Respond, providing a deadline of July 21, 2025, for Defendant to respond to Plaintiff's Complaint. See Docket #14.

On July 21, 2025, Defendant filed a Motion to Compel Arbitration and Stay Proceedings (Docket #15) ("Motion to Compel"), a Motion to Strike Class Allegations (Docket #17) ("Motion to Strike"), and a Motion to Dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(6) (Docket #18) ("MTD").

Pursuant to Local Civil Rule 7(d)(3), Plaintiff's opposition to the Motion to Strike is due on August 5, 2025.¹

Pursuant to Local Civil Rule 7(d)(4), Plaintiff's oppositions to the Motion to Compel and MTD are due on August 11, 2025.

Plaintiff intends to amend her Complaint as of right pursuant to Fed. R. Civ. P. 15 on or before her deadline to do so, which is August 11, 2025.

The parties agree that Plaintiff's amendment will moot the present Motion to Strike and MTD, and Defendant has indicated that it intends to renew one or both motions once Plaintiff has amended. However, Defendant wishes for its motion to compel to remain pending.

To allow coordinated briefing on Defendant's forthcoming renewed motions following Plaintiff's amendment and Defendant's presently pending Motion to Compel, and because the requested extensions will not prejudice either party, the parties hereby request the Court enter the following briefing schedule:

Deadline	Date
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¹ Under Local Civil Rule 7, a motion to strike is a 21-day motion. However, Defendant noted its Motion to Strike as a 28-day motion.

Deadline for Plaintiff to file Amended Complaint	August 11, 2025
Deadline for Defendant to file Motion to Dismiss and/or Motion to Strike Amended Complaint	August 25, 2025
Deadline for Plaintiff to Oppose Defendant's Motion to Dismiss, Motion to Strike, and Motion to Compel Arbitration and Stay Proceedings	September 15, 2025
Deadline for Defendant to file replies in support of Motion to Dismiss, Motion to Strike, and Motion to Compel Arbitration and Stay Proceedings	September 29, 2025

WHEREFORE, the parties respectfully request an Order modifying the current case deadlines as described herein.

ORDER

IT IS SO ORDERED that the parties adhere to the below briefing schedule:

Deadline	Date
Deadline for Plaintiff to file Amended Complaint	August 11, 2025
Deadline for Defendant to file Motion to Dismiss and/or Motion to Strike Amended Complaint	August 25, 2025
Deadline for Plaintiff to Oppose Defendant's Motion to Dismiss, Motion to Strike, and Motion to Compel Arbitration and Stay Proceedings	September 15, 2025
Deadline for Defendant to file replies in support of Motion to Dismiss, Motion to Strike, and Motion to Compel Arbitration and Stay Proceedings	September 29, 2025

The Clerk shall re-note Defendant's Motion to Compel Arbitration and Stay Proceedings for September 29, 2025.

DATED this 28th day of July, 2025



Marsha J. Pechman
United States Senior District Judge

STIPULATED MOTION AND ORDER TO SET BRIEFING
SCHEDULE – 3

CAUSE NO. 2:25-cv-00986

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IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 28th day of July, 2025.

/s/ Timothy W. Emery

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DATED this 28th day of July, 2025.

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STIPULATED MOTION AND ORDER TO SET BRIEFING
SCHEDULE – 4

CAUSE NO. 2:25-cv-00986

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